



pleadings, Plaintiff simply cannot allege any cognizable claim against Defendants. Indeed, Plaintiff's Proposed First Amended Complaint adds nothing that would support a finding of liability against either of the Defendants.

WHEREFORE, based on the foregoing and for the reasons described in their Brief (Doc. 28 and Supplement Brief (Doc. 34), Defendants Beavers and Hughey pray that the Court dismisses Plaintiff's claims against them and for such other relief to which they may be entitled.

Respectfully submitted,

/s/ S. Cass Weiland  
S. Cass Weiland  
State Bar No. 21081300  
Robert A. Hawkins  
State Bar No. 00796726  
SQUIRE PATTON BOGGS LLP  
2000 McKinney Ave., Suite 1700  
Dallas, Texas 75201  
(214) 758-1500  
(214) 758-1550 (fax)  
[cass.weiland@squirepb.com](mailto:cass.weiland@squirepb.com)  
[robert.hawkins@squirepb.com](mailto:robert.hawkins@squirepb.com)

ATTORNEYS FOR DEFENDANTS  
BRYAN BEAVERS AND RHONDA HUGHEY

**CERTIFICATE OF SERVICE**

I certify that on July 13, 2020, a true and correct copy of the foregoing was served on *pro se* Plaintiff via certified mail, return-receipt requested, and via the Court's electronic filing system if a participating recipient.

Todd Michael Tomasella  
9201 Warren Parkway, #200  
Frisco, TX 75035

/s/ S. Cass Weiland  
S. Cass Weiland